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UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

In Re Bard IVC Filters Products Liability Litigation	No. MD-15-02641-PHX-DGC
DEBRA MULKEY,  Plaintiffs,  v.  C.R. BARD, INC., a New Jersey corporation and BARD PERIPHERAL VASCULAR, an Arizona corporation,  Defendants.	No. CV-16-00853-PHX-DGC  <b>DISCLOSURE OF KRISHNA KANDARPA, M.D., AS NONRETAINED EXPERT WITNESS PURSUANT TO RULE 26(a)(2)(C)</b>

Pursuant to F.R.C.P. 26(a)(2)(C), plaintiff submits the following disclosure for Krishna Kandarpa, M.D.:

- (i) Dr. Kandarpa is an interventional radiologist hired by Bard to oversee its EVEREST Study as the Medical Monitor.

- (ii) Plaintiff expects Dr. Kandarpa to testify concerning the EVEREST Study and all documents related to the same, as well as his observations and findings related to that study, complications and adverse events that occurred during the study, the design and purpose of the study, his recommendations to and interactions with Bard based on the study, and his observations about safety issues with the filters involved in the EVEREST study and failures of those filters.
- (iii) Dr. Kandarpa will also testify about the lack of accuracy and misleading nature of the EVEREST information included in the IFU by Bard, and his expectations, as well as the expectations of other reasonable interventional radiologists, as to what should have been included in the IFU about the EVEREST study.
- (iv) Plaintiff further expects Dr. Kandarpa, as an interventional radiologist, to testify concerning the failures/complications associated with IVC filters, the association between the failures/complications of those filters, and the dangers associated with those filter failures/complications.
- (v) Lastly, to the extent not already covered herein, Plaintiff expects Dr. Kandarpa to provide testimony consistent with his July 19, 2018 deposition.

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 6, 2018 a true and correct copy of the foregoing was sent via U.S. Mail and/or Electronic Mail to:

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\*Counsel for Plaintiffs will be served in accordance  
with the Court's Case Management Order No. 1

s/Wendy Espitia  
Wendy Espitia